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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

LONNY JOSEPH DITIRRO, JR.,

Defendant.

**SUPERSEDING  
CRIMINAL INDICTMENT**

Case No: 2:16-cr-0216-KJD-VCF

**VIOLATIONS:**

**COUNT I**

Sexual Exploitation of Children, in violation  
of 18 U.S.C. § 2251(a)

**COUNT II**

Sexual Exploitation of Children, in violation  
of 18 U.S.C. § 2251(a)

**COUNT III**

Sexual Exploitation of Children, in violation  
of 18 U.S.C. § 2251(a)

**COUNT IV**

Sexual Exploitation of Children, in violation  
of 18 U.S.C. § 2251(a)

**COUNT V**

Possession of Child Pornography, in violation  
of 18 U.S.C. § 2252A(a)(5)

**FORFEITURE ALLEGATIONS**

Criminal Forfeiture, 18 U.S.C. § 2253

1 **THE GRAND JURY CHARGES THAT:**

2  
3 **COUNT ONE**

4 ***Sexual Exploitation of Children***

5 Beginning on a date unknown, and continuing to on or about July 10, 2014, in the State  
6 and Federal District of Nevada,

7 **LONNY JOSEPH DITIRRO, JR.,**

8 defendant herein, did employ, use, persuade, induce, entice, and coerce a minor, "R.B.," to  
9 engage in any sexually explicit conduct for the purpose of producing any visual depiction of such  
10 conduct, and that visual depiction was produced and transmitted using materials that have been  
11 mailed, shipped, and transported in and affecting interstate and foreign commerce by any means,  
12 including by computer, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

13 **COUNT TWO**

14 ***Sexual Exploitation of Children***

15 Beginning on a date unknown, and continuing to on or about March 3, 2015, in the State  
16 and Federal District of Nevada,

17 **LONNY JOSEPH DITIRRO, JR.,**

18 defendant herein, did employ, use, persuade, induce, entice, and coerce a minor, "C.A.," to  
19 engage in any sexually explicit conduct for the purpose of producing any visual depiction of such  
20 conduct, and that visual depiction was produced and transmitted using materials that have been  
21 mailed, shipped, and transported in and affecting interstate and foreign commerce by any means,  
22 including by computer, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

**COUNT THREE**

***Sexual Exploitation of Children***

Beginning on a date unknown, and continuing to on or about August 12, 2015, in the State and Federal District of Nevada,

**LONNY JOSEPH DITIRRO, JR.,**

defendant herein, did employ, use, persuade, induce, entice, and coerce a minor, "S.M.," to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and that visual depiction was produced and transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

**COUNT FOUR**

***Sexual Exploitation of Children***

Beginning on a date unknown, and continuing to on or about August 14, 2014, in the State and Federal District of Nevada,

**LONNY JOSEPH DITIRRO, JR.,**

defendant herein, did employ, use, persuade, induce, entice, and coerce a minor, "T.H.," to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and that visual depiction was produced and transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

**COUNT FIVE**

***Possession of Child Pornography***

Beginning on a date unknown, and continuing to on or about September 10, 2015, in the State and Federal District of Nevada,

**LONNY JOSEPH DITIRRO, JR.,**

defendant herein, did knowingly possess any book, magazine, periodical, film, videotape, computer disk, and any other material that contains an image of child pornography, as defined in Title 18, United States Code, Section 2256(8), that has been mailed, and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that have been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, all in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

**FORFEITURE ALLEGATION**

***Sexual Exploitation of Children and Possession of Child Pornography***

1. The allegations contained in Counts One, Two, Three, Four, and Five of this Criminal Indictment are Hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253(a)(1), 2253(a)(2), and 2253(a)(3).

2. Upon conviction of any of the felony offenses charged in Counts One, Two, Three, Four, and Five of this Criminal Indictment,

**LONNY JOSEPH DITIRRO, JR.,**

defendant herein, shall forfeit to the United States of America, any visual depiction described in Title 18, United States Code, Sections 2251 and 2252A, and any book, magazine, periodical, film, videotape, and other matter which contains any such visual depiction, which was produced,

1 transported, mailed, shipped and received in violation of Title 18, United States Code, Sections  
2 2251(a) and 2252A(a)(5)(B):

3 defendant herein, shall forfeit to the United States of America, any property, real and  
4 personal, constituting and traceable to gross profits and other proceeds obtained from violations of  
5 Title 18, United States Code, Sections 2251(a) and 2252A(a)(5)(B):

6 defendant herein, shall forfeit to the United States of America, any property, real and  
7 personal, used and intended to be used to commit and to promote the commission of Title 18,  
8 United States Code, Sections 2251(a) and 2252A(a)(5)(B) and any property traceable to such  
9 property:

10 (1) SanDisk Micro Secure Digital Card (16GB) Ultra Plus.  
11 (all of which constitutes property).

12 All pursuant to Title 18, United States Code, Sections 2251(a), 2251(e), 2252A(a)(5)(B),  
13 and 2252A(b)(2).

14 **DATED:** this 24<sup>th</sup> day of April, 2018.

15 **A TRUE BILL:**

16  
17 /S/  
18 FOREPERSON OF THE GRAND JURY

19 DAYLE ELIESON  
20 United States Attorney

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22 ELHAM ROOHANI  
23 Assistant United States Attorney  
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